1 2 3 4	Steven Mack, Esq. GIBBS GIDEN LOCHER TURNER SENET & W 7251 W. Lake Mead Blvd., Suite 450 Las Vegas, NV 89128 (702) 836-9800 Smack@gibbsgiden.com	TITTBRODT LLP	
5	Alejandro F. Garcia, Esq.		
6	Pro Hac Vice Florida Bar Number: 98505		
7	RAMHOFER GARCIA, PLLC		
8	11900 Biscayne Boulevard, Suite 742 North Miami, Florida 33018		
9	(305) 481-9733 agarcia@ramhofergarcia.com		
	agarcia@familorergarcia.com		
10	Alexis M. De La Rosa. Esq. Pro Hac Vice		
11	Florida Bar Number: 1038679		
12	RAMHOFER GARCIA, PLLC 11900 Biscayne Boulevard, Suite 742		
13	North Miami, Florida 33018		
14	(305) 481-9733 adelarosa@ramhofergarcia.com		
15	Attorneys for Defendants		
16	Thorneys for Defendants		
17	UNITED STATES DISTRICT COURT		
18	DISTRICT	OF NEVADA	
19	Eric Scholer, an individual Nevada resident; Scholer & Sons, LLC, a Nevada limited liability	Case No. 2:22-cv-01358-RFB-DJA	
20	company;		
	Plaintiffs,	STIPULATION AND ORDER TO EXTEND	
21	V.	DEADLINE FOR REPLY IN SUPPORT OF	
22	Richard Vairo Santos, an individual residing in	DEFENDANTS' MOTION TO DISMISS (ECF NO. 28)	
23	Florida; Richard's Brazilian Sausage, LLC, a Florida limited liability company; Ewerton	EIDET DEOLIEST	
24	Consulting and Investments, LLC, a Florida	FIRST REQUEST	
25	limited liability company; Ewerton Vairo		
26	Consulting and Investments, LLC; PNC BANK, a Pennsylvania Company (named as a nominal defendant only);		
27			
28		1	

1	Defendants.	
2		
3	Plaintiffs Eric Scholer and Scholer & Sons, LLC ("Plaintiffs"), Defendant Richard Vairo	
4	Santos, Richard's Brazilian Sausage, LLC, Ewerton Consulting and Investments, LLC, Ewerton	
5	Vairo Consulting and Investments, LLC (referred to hereafter collectively as "Defendants"), by and	
6	through their respective undersigned counsel, hereby stipulate and agree as follows:	
7	Defendants' Reply in Support of Defendants' Motion to Dismiss (ECF No. 28) is due on	
8	Friday, November 18, 2022.	
9	To accommodate the needs of potential witnesses in response to the Motion and the	
10	translation of foreign language evidence, it is stipulated that Defendants have an additional four (4)	
11	days to file a Reply in support of the Motion to dismiss.	
12	Accordingly, the Parties stipulate that the Reply will be due on Tuesday November 22,	
13	2022.	
14		
15	Dated this 18 th day of November, 2022.	Dated this 18 th day of November, 2022.
16	SCHOLER & SONS, LLC	GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP
17	/s/ Jacob A. Reynolds	
18	Jeffrey R. Hall (9572)	/s/ Steven J. Mack
19	Ariel Johnson (13357) 10080 West Alta Drive, Suite 200	Steven J. Mack (4000) 7251 W. Lake Mead Blvd., Suite 450
20	Las Vegas, NV 89145	Las Vegas, NV 89128
21	Jacob A. Reynolds (10199)	Alejandro F. Garcia, Esq.
22	SCHOLER & SONS, LLC 9960 West Cheyenne Ave., Suite 130	Pro Hac Vice Florida Bar Number: 98505
23	Las Vegas, NV 89129	RAMHOFER GARCIA, PLLC 11900 Biscayne Boulevard, Suite 742
24		North Miami, Florida 33018
25	Attorneys for Plaintiffs	(305) 481-9733 agarcia@ramhofergarcia.com
26		Alexis M. De La Rosa. Esq.
27		Pro Hac Vice
28		

Case 2:22-cv-01358-RFB-DJA Document 48 Filed 11/21/22 Page 3 of 6

1	Florida Bar Number: 1038679 RAMHOFER GARCIA, PLLC
2	11900 Biscayne Boulevard, Suite 742
3	North Miami, Florida 33018 (305) 481-9733
4	adelarosa@ramhofergarcia.com
5	Attorneys for Defendants Richard Vairo
6	Santos, Richard's Brazilian Sausage, LLC, Ewerton Consulting and Investments, LLC,
7	Ewerton Vairo Consulting and Investments,
8	LLC
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	

ORDER 1 2 IT IS HEREBY ORDERED that the due date for Defendants' Reply in Support of 3 Defendants' Motion to Dismiss shall be Tuesday November 22, 2022. 4 Dated this 21st day of November, 2022. 5 6 7 8 DISTRICT COURT JUDGE RICHARD F. 9 BOULWARE, II 10 11 12 Respectfully submitted by: 13 GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP 14 /s/ Steven J. Mack 15 Steven J. Mack (4000) 16 7251 W. Lake Mead Blvd., Suite 450 Las Vegas, NV 89128 17 18 Alejandro F. Garcia, Esq. Pro Hac Vice 19 Florida Bar Number: 98505 RAMHOFER GARCIA, PLLC 20 11900 Biscayne Boulevard, Suite 742 North Miami, Florida 33018 21 (305) 481-9733 22 agarcia@ramhofergarcia.com 23 Alexis M. De La Rosa. Esq. Pro Hac Vice 24 Florida Bar Number: 1038679 RAMHOFER GARCIA, PLLC 25 11900 Biscayne Boulevard, Suite 742 26 North Miami, Florida 33018 (305) 481-9733 27 adelarosa@ramhofergarcia.com

28

Case 2:22-cv-01358-RFB-DJA Document 48 Filed 11/21/22 Page 5 of 6

Attorneys for Defendants Richard Vairo Santos, Richard's Brazilian Sausage, LLC, Ewerton Consulting and Investments, LLC, Ewerton Vairo Consulting and Investments, LLC

. _

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2022, I caused a copy of this STIPULATION AND ORDER TO EXTEND DEADLINE FOR REPLY IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS (ECF NO. 28) to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

<u>/s/ Alejandro F. Garcia</u> Alejandro F. Garcia, Esq.